

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

HAWAII DISABILITY RIGHTS ) CIVIL NO. 06-00605 DAE-BMK  
CENTER; )  
 )  
 Plaintiff, )  
 )  
 )  
 vs. )  
 )  
 )  
 SUSANNA F. CHEUNG, in her capacity ) **DECLARATION OF**  
as President and Chief Executive Officer ) **WINSTON D. M. LING**  
of Opportunities for the Retarded, Inc.; )  
and OPPORTUNITIES FOR THE )  
RETARDED, INC., a Hawaii corporation; )  
 )  
 Defendants. )  
 )

**DECLARATION OF WINSTON D. M. LING**

I, WINSTON D. M. LING, do hereby declare as follows:

1. I am an attorney at the Hawai'i Disability Rights Center ("HDRC"), and will serve as Plaintiff's counsel of record in the above-entitled action.
2. Exhibit "A", attached hereto to the Plaintiff's Motion for Preliminary Injunction and filed with the Court on this date, is a true and correct copy of the Settlement Agreement and Access Protocol between HDRC and ORI in HDRC v. Cheung, et al., U.S.D.C. Hawai'i Civil No. 05-00557 DAE-LEK (dismissed with prejudice by the Court, June 5, 2006).

3. Exhibit "B", attached hereto to the Plaintiff's Motion for Preliminary Injunction and filed with the Court on this date, is a true and correct copy of the DD Act regulation 45 C.F.R. § 1386.22.

4. Exhibits "C" through "H", attached hereto to the Plaintiff's Motion for Preliminary Injunction and filed with the Court on this date, are true and correct copies of correspondence between HDRC President Gary L. Smith and ORI President Susanna F. Cheung.

I declare that the foregoing is true and correct to the best of my knowledge.

DATED: Honolulu, Hawai'i, November 9, 2006.



---

WINSTON D. M. LING

Declarant